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Committee of Experts on the Transport of Dangerous Goods and on the Globally Harmonized System of Classification and Labelling of Chemicals

Sub-Committee of Experts on the Globally Harmonized System of Classification and Labelling of Chemicals

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Geneva, 29 June – 1 July 2015
Item 3 (a) of the provisional agenda
Hazard communication issues:
Labelling of small packagings

Labelling of small packagings

Transmitted by the European Chemical Industry Council (CEFIC) on behalf of the informal correspondence group

Introduction

1. At its 28th session the Sub-Committee adopted a first example illustrating some of the general principles applicable to the labelling of small packagings (see document ST/SG/AC.10/2014/22) which had been proposed for inclusion in Annex 7 of the GHS. The Sub-Committee noted that the informal correspondence group again discussed a revised proposed second example (see informal document INF.27) which has been developed to illustrate other labelling issues (e.g. product is required to carry a large number of GHS label elements and is sold in more than one country) and their possible solutions (e.g. the use of fold-out labels).

Development of an example for fold-out labels

2. The proposed second example presented during the 28th session (see informal document INF.27) has been further developed to reflect comments/suggestions brought forward by members of the informal correspondence group during its meeting in December 2014.

3. The comments/suggestions raised during the informal correspondence group meeting did not impact the principle that was proposed for fold-out labels (i.e. its use in the

particular scenario plus the proposed format and contents). All suggestions have been taken into account in the preparation of the revised proposed second example shown below.

4. As this is a multilingual example, different languages are also presented in the drawing of the label. The group chose several languages to illustrate the concept, although in practice this combination of languages on a label may be rare.

5. This revised second example detailed below and its proposed inclusion in Annex 7 of the GHS are submitted for further consideration by the Sub-Committee.

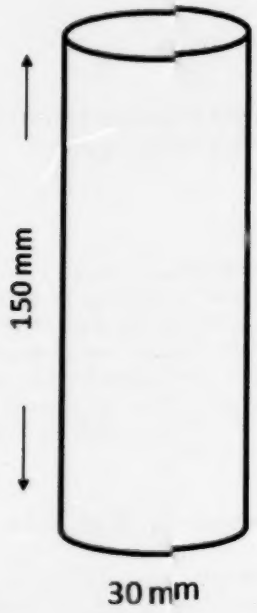
Example: Multilayer booklet format/fold-out label

(i) Product and use:

Activator for professional use

(ii) Packaging description and size

Metal container with 100 ml capacity



(iii) Labelling problems encountered

The product is required to carry a large number of GHS label elements (three hazard pictograms, three hazard statements and numerous precautionary statements).

Besides that, it will be sold in different countries, so different languages are required.

(iv) Possible options to address labelling problems encountered

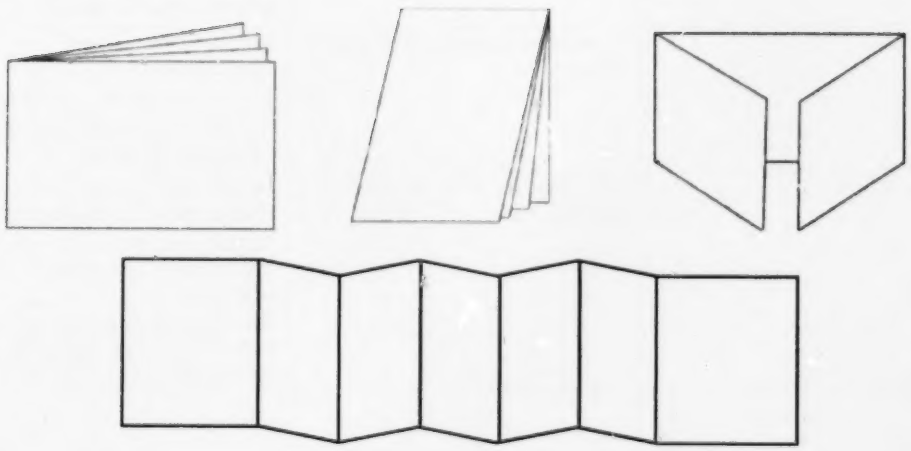
Issue	Potential options	Comments
Not possible to put all applicable GHS label elements and directions for use on the immediate container in all languages (i.e. the metal container) due to its size and shape	Provide label elements in a fold-out label securely attached to the metal container	Possible practical solution – fold-out label must be securely attached to the container and remain so during foreseeable conditions and period of use Provisions for fold-out labels e.g. what label elements must go on the front page and what elements could appear on the internal fold-out page(s)? Minimum size of pictograms or text to ensure the readability of the information? Layout of the pictograms – can they be contiguous or do they have to be separate?
	Provide label elements on a tie-on tag	Not practical as tie-on tag would need to be very large to accommodate all required labelling even with printing on both sides of the tag. Large tag may impede use of the product. Could possibly attach a fold-out label to the tie-on tag but no guarantee the tag would remain attached to the container – may impede user during application thus could possibly be removed. General principles require all applicable label elements to appear on immediate container where possible; also some label elements on the immediate container may need to be accessible to users throughout life of product. Would therefore also need to include minimum label elements on immediate container just in case the tie-on tag is removed by the user.
	Provide label elements on an outer packaging	Not an option – product is not supplied in outer packaging Also need to take account of sustainability considerations (e.g. packaging reduction, environmental footprint, etc.)
	Increase the size of the container so that a larger label can be affixed	Increasing the size of the container is not practical from the intended use perspective. Increasing the size of the container without increasing product volume may be misleading Also need to take account of sustainability considerations (e.g. packaging reduction, environmental footprint, etc.)

(v) Proposed/suggested solution

Multilayer booklet format/fold-out label which is securely affixed to the immediate container (i.e. the fold-out label is attached so that it remains affixed during the foreseeable conditions and period of use). The fold-out label is produced in such a way that the front part cannot be detached from the remainder of the label.

Examples of formats for multilayer booklet format/foldout labels which could be used for the proposed/suggested solution are:

Reading book style **Order-book style** **"window"-style**



"accordion" style

The information is structured as follows:

Front page

Information to be provided on the front page of the multilayer/fold-out label should contain at least:

- Product identifier,
- Hazard pictogram(s)
- Signal word
- Supplier identification (name, address and telephone number of the company)

Front page would also include a symbol to inform the user that the label can be opened and to illustrate that additional information is available on inside pages. Besides this, the languages which are covered by the label should be indicated using the country codes or language codes on the front page.

Pages inside

Full product identifier including hazardous components as applicable, signal word, hazard statements, precautionary statements, and additional information (e.g. directions for use, information required by other regulations, etc.).

Back page (affixed to the immediate container):

- Product identifier,
- Hazard pictogram(s)
- Signal word
- Supplier identification (name, address and telephone number of the company)

It is recognized that some regulatory systems (e.g. pesticides) may have specific requirements for the application of labels using a multilayer or booklet style format. Where this is the case, labelling would be undertaken in accordance with the competent authority's requirements.

The text on the inside pages can also be distributed on more than one page, if the available space is not sufficient. In general it is better to spread the text across more than one page than to have smaller letters that make the text difficult to read. However, in practice there may be a limit on the number of folds and so on the amount of text and number of languages that can be included, depending on the size of the container. As illustrated in the example, indicators of each language should be included on the front page and within the fold-out label to make it easier for the readers to identify text in their language.

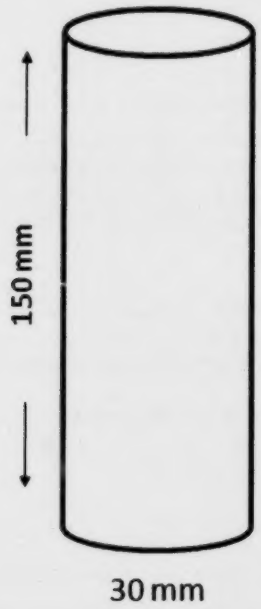
Proposal

Add a new example in annex 7 of the GHS as set out in the following annex.

Annex

Example 9: Example for fold-out label

Metal container with 100 ml capacity containing a product for professional use



The product is required to carry a large number of GHS label elements (three hazard pictograms, three hazard statements and numerous precautionary statements). Besides that, it will be sold in different countries, so different languages are required.

A fold-out label is securely affixed to the immediate container (i.e. the fold-out label is attached so that it remains affixed during the foreseeable conditions and period of use). The fold-out label is produced in such a way that the front part cannot be detached from the remainder of the label.

The information is structured as follows and is provided, if applicable, in all the languages used for the label:

Front page

The information provided on the front page of the fold-out label comprises:

- Product identifier,
- Hazard pictogram(s)
- Signal word
- Supplier identification (name, address and telephone number of the company)

The front page also includes a symbol to inform the user that the label can be opened and to illustrate that additional information is available on inside pages. Besides this, the languages which are covered by the label are indicated using the country codes or language codes on the front page.

Pages inside

- Full product identifier including hazardous components as applicable
- Signal word
- Hazard statements
- Precautionary statements
- Additional information (e.g.directions for use, information required by other regulations, etc.).

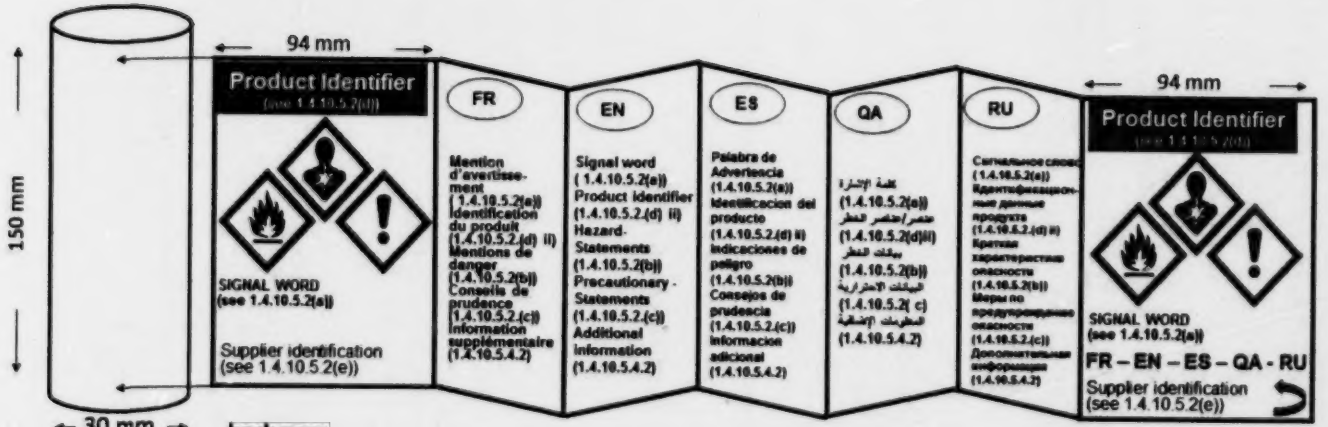
Back page (affixed to the immediate container)

- Product identifier,
- Hazard pictogram(s)
- Signal word
- Supplier identification (name, address and telephone number of the company)

It is recognized that some regulatory systems (e.g. pesticides) may have specific requirements for the application of labels using a multilayer or booklet style format. Where this is the case, labelling would be undertaken in accordance with the competent authority's requirements.

The text on the inside pages can also be distributed on more than one page, if the available space is not sufficient. In general it is better to spread the text across more than one page than to have smaller letters that make the text difficult to read. However, in practice there may be a limit on the number of folds and so on the amount of text and number of languages that can be included, depending on the size of the container. As illustrated in the example, indicators of each language should be included on the front page and within the fold-out label to make it easier for the readers to identify text in their language.

See illustration on next page ([x] scale).



back page
Completely fixed to immediate container

front page
wrapped around the can